

Torres, Francine

From: NEFSCO@aol.com%inter2 [NEFSCO@aol.com] on behalf of NEFSCO@aol.com
Sent: Tuesday, February 22, 2005 6:49 PM
To: Torres, Francine
Subject: Approve Ferric Phosphate
Attachments: ATTACHMENT.TXT

To: Francine Torres
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW
Room 4008-So, Ag Stop 0268
Washington, DC 20250-0200

Fax to: 202-205-7808 or email to francine.torres@usda.gov

Re: Approve Ferric Phosphate for use in organic farming.

Date of Review: February 28th – March 3, 2005

As an organic grower I'm encouraging you to approve Ferric Phosphate for inclusion on the National List and use in organic farming. I am against the two TAP reviewer's recommendations of not allowing Ferric Phosphate for use as a molluscicide. Ferric Phosphate occurs naturally in soil and has no known harmful effects on other organisms. Current organically approved methods cited as alternatives are not practical for organic farming.

I/We operate an organic Sales and Consulting Co. farm of 24,000 (Organic Ac) acres in California. Slugs and snails are a major pest on some of our farms that we consult with. Economic losses from slug/snail damage are often in excess of \$ 200.00 /acre in a given year.

Currently, there are no effective organically approved slug/snail control methods. Other methods such as copper banding, trapping, decoy plantings or diatomaceous earth are neither practical nor effective on a production farm of this acreage and do not significantly reduce slug/snail damage within the field. I/we do not use these methods on our farm.

Organic growers need to have effective tools at our disposal. Lack of an organic slug and snail bait costs us money every year. Please ensure that ferric phosphate is approved for use as a molluscicide in organic farming.

Sincerely,

Ralph W. Jurgens
Agronomist - Nutritional Consultant
New Era Farm Service, Inc.
23004 Rd 140

2/23/2005